

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

LEONARD K. BAYLIS,)	
)	
Plaintiff,)	
)	
v.)	C. A. No. 06-11-SLR
)	
STANLEY TAYLOR, et al.,)	
)	
Defendants.)	

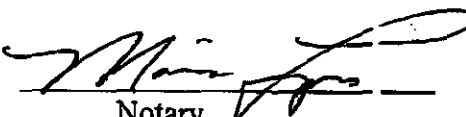
AFFIDAVIT OF TODD KRAMER

I, Todd Kramer, having been duly sworn according to law, depose and state as follows:

1. I make this Affidavit based upon personal information.
2. I am employed by the State of Delaware's Department of Correction as a Senior Correctional Counselor at the Delaware Correctional Center ("DCC") in Smyrna, Delaware.
3. On November 17, 2005, Plaintiff Leonard Baylis ("Plaintiff") was transferred from the Howard R. Young Correctional Institution to DCC to attend the Greentree Substance Abuse Program.
4. On April 3, 2006, Plaintiff was transferred from the Greentree Substance Abuse Program to the Medium High Security area of DCC due to his refusal to participate in the program.
5. On June 6, 2006, Plaintiff was transferred to Protective Custody, at his request.
6. Plaintiff requested that he be transferred from Protective Custody to DCC's Mental Health Unit. Upon review and approval of the Multi-Disciplinary Team, Plaintiff was transferred to the Mental Health Unit on June 12, 2006.


Todd Kramer

SWORN AND SUBSCRIBED before me this 14th day of June, 2006.


Notary